Jennifer D. Hindin
202.719.4975
jhindin@wileyrein.com

August 29, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Errata for Comments of the C-Band Alliance filed August 7, 2019, GN Docket No. 18-122, RM-11791, RM-11778

Dear Ms. Dortch,

On August 7, 2019, the C-Band Alliance ("CBA") filed comments in the above-referenced proceedings in response to a public notice released by the Commission on July 19, 2019 (the "Comments").[1] The Comments contained an inadvertent error by referring to the orbital arc within which C-band satellites serve CONUS as between **89° W.L. and 139° W.L.** As the CBA has previously specified,[2] the relevant orbital arc is between **87° W.L. and 139° W.L.** Accordingly, the CBA files this errata to correct the Comments as follows[3]:

- Pg. 11—"These studies considered MVPD headends accessing the 87° W.L. to 139° W.L. satellite arc and utilized the well-known Irregular Terrain Model for determining propagation loss." (citation omitted)

- Pgs. 27-28—"In response to AT&T's input, the C-Band Alliance has conducted additional analysis and concluded that existing CONUS video and radio services, once repacked as proposed under its transition plan, will be transmitted from satellites located between 87° W.L. and 139° W.L. across the orbital arc." (citation omitted)

- Attachment A, pg. 2—"This value must be met for all elevation angles to any space station from 87 west longitude to 139 west longitude at every registered earth station within CONUS and at any point within one arc second from the registered earth station."

[1] *Wireless Telecommunications Bureau, International Bureau, Office of Engineering and Technology, and Office of Economics and Analytics Seek Focused Additional Comments in 3.7-4.2 GHZ Band Proceeding*, Public Notice, DA 19-678 (rel. July 19, 2019).
[2] *See, e.g.,* Further Technical Statement, filed as attachment to Letter from Jennifer Hindin to Marlene H. Dortch, Secretary, FCC, GN Docket. No. 18-122 (filed Mar. 4, 2019).
[3] The substance of the Comments remains unchanged; the analyses conducted by the CBA and referenced in the Comments considered the correct orbital arc.

- Attachment A, pgs. 2-3—"These values must be met for all elevation angles to any space station from 87 west longitude to 139 west longitude at every registered earth station within CONUS and at any point within one arc second from the registered earth station."

The CBA also wishes to correct the following additional inadvertent errors in Attachment A:

- Attachment A, pg. 3 (adding text in red and deleting text in strikethrough)—"(3) Co-frequency emissions into FSS earth stations operating in the flexible use C-Band. The APSD produced in the flexible use C-Band by all base stations operated by a Flexible Use Licensee and attached user equipment within 150 kilometers of a registered earth station authorized to operate in the 3700-3900 MHz band as measured at the output of the earth station antenna shall not exceed the following values:

  for earth stations used for satellite telemetry, tracking and control ("TT&C")

  -133 -10log10(n1) dBm/MHz

  for other earth stations

  -128 -10log10(n1) dBm/MHz

  n1 is the number of distinct Flexible Use Licensees using the same frequency block in the services areas within 150 kilometers of the earth station.

  These values must be met for all elevation angles greater than 5 degrees ~~to any space station from 87 west longitude to 139 west longitude~~ at every registered earth station within CONUS that is authorized to operate in the flexible use C-band and at any point within one arc second from the registered earth station. The earth stations authorized to operate in the flexible use C-Band are: [X]. The Flexible Use Licensee shall calculate the APSD using the reference antenna pattern."

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Jennifer Hindin
Jennifer Hindin
Counsel for the C-Band Alliance

Cc (*via email*):

Bahman Badipour
Thomas Derenge
Michael Ha
Ira Keltz
Julius Knapp
Giulia McHenry
Aspasia Paroutsas
Robert Pavlak
Barbara Pavon
Matthew Pearl
Paul Powell
Jamison Prime
Jim Schlichting
Becky Schwartz
Donald Stockdale
Tom Sullivan